

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

LIANG YANG, Individually and on Behalf of : Civil Action No. 1:21-cv-01047-FB-RLM All Others Similarly Situated,

Plaintiff,

VS.

TRUST FOR ADVISED PORTFOLIOS, INFINITY Q CAPITAL MANAGEMENT, LLC, CHRISTOPHER E. KASHMERICK, JOHN C. CHRYSTAL, ALBERT J. DIULIO, S.J., HARRY E. RESIS, RUSSELL B. SIMON, LEONARD POTTER, and JAMES VELISSARIS,

Defendants.

## **CLASS ACTION**

DECLARATION OF RAVI P. DATTANI IN SUPPORT OF MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

- I, Ravi P. Dattani, submit this declaration in support of Schiavi + Company LLC DBA Schiavi + Dattani's ("Schiavi and Dattani") Motion for Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
- 1. I am the President of Schiavi and Dattani and I am authorized to make this declaration on Schiavi and Dattani's behalf.
- 2. Schiavi and Dattani is a Delaware-based financial planning and investment advisory firm established in 1983 with approximately \$480 million in assets under management. Schiavi and Dattani manages assets for nearly 200 clients. Schiavi and Dattani received assignments of claims from its clients, as reflected in its lead plaintiff motion papers, transferring all claims, demands, and causes of action from violations under the federal securities laws of the United States of America in connection with the purchase of Infinity Q Diversified Alpha Fund Investor Class shares (IQDAX) and/or Infinity Q Diversified Alpha Fund Institutional Class shares (IQDNX) (together, "Infinity Q securities"). Together, these Schiavi and Dattani clients suffered substantial losses in connection with their transactions in Infinity Q securities during the Class Period. As a result, Schiavi and Dattani is motivated to seek to obtain the best possible result for its clients and the class.
- 3. Schiavi and Dattani understands that a lead plaintiff acts on behalf of and for the benefit of all potential class members and oversees and directs counsel throughout the litigation.
- 4. Schiavi and Dattani is aware that, as lead plaintiff, it will interact with and direct counsel, review and comment on important documents in the case, attend important court hearings if my attendance is requested or required by the Court, participate in discovery, participate in settlement discussions, attend trial, if necessary, and is empowered to authorize a potential

settlement on behalf of the class. Schiavi and Dattani is willing to perform all of these duties on behalf of the class members.

- 5. Schiavi and Dattani understands that the lead plaintiff's share of any recovery is the same as every other potential class member. As Schiavi and Dattani's Certification states, it will not accept any payment for serving as a representative party beyond my *pro-rata* share, except any reasonable costs and expenses such as lost wages and travel expenses directly related to the class representation, as ordered or approved by the Court pursuant to the Private Securities Litigation Reform Act of 1995.
- 6. Schiavi and Dattani is aware that it has the right to select counsel as part of the lead plaintiff process. Based on their experience prosecuting securities cases and history of collaboration, Schiavi and Dattani has selected Robbins Geller Rudman & Dowd LLP and Boise Schiller Flexner LLP to represent the class in this case on a contingency basis. Before selecting counsel, Schiavi and Dattani discussed the lead plaintiff's role, responsibilities, and process with its counsel.

I declare under penalty of perjury that the foregoing is true and correct. Executed this **27** day of April, 2021, at Wilmington, Delaware.

RAVI P. DATTANI